

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA)	
Plaintiff,)	
)	
vs.)	No. 3:16-CR-20
)	(Collier/Guyton)
MARK HAZELWOOD et al.)	
Defendant.)	

MOTION REQUESTING MODIFICATION OF TERMS OF RELEASE

Mark Hazelwood, through counsel, moves this Court to modify the terms of his release to substitute his third-party custodian to permit Mrs. Hazelwood to travel on January 15-17, 2020 and January 22-23, 2020.

I. FACTUAL BACKGROUND

This Court has granted Mr. Hazelwood's numerous prior requests to have substitute third-party custodians step in during his wife's travel.

During each previous modification to Mr. Hazelwood's conditions, he has scrupulously abided each and every instruction from the Probation Office. We again ask the Court to modify Mr. Hazelwood's bail to permit a substitute third-party custodian while Mrs. Hazelwood travels.

Specifically, we request that Parker Bohn be allowed to step in as third-party custodian from January 16-17, 2020, and that Bobby Maze be permitted to substitute as third-party custodian from January 22-23, 2020.

II. MODIFICATION REQUEST

A. January 15-17, 2020

Mrs. Hazelwood is scheduled to travel out of state from January 15-17, 2020. To facilitate her travel, Parker Bohn has agreed to step in as third-party custodian. She will be informed of her duties and will sign the bond conditions – she has already acted as substitute third party custodian.

B. January 22-23, 2020

Mrs. Hazelwood is scheduled to travel out of state from January 22-23, 2020. To facilitate her travel, Bobby Maze has agreed to step in as third-party custodian. Mr. Maze will be informed of his duties and will sign the bond conditions – Mr. Maze has already acted as substitute third party custodian.

Counsel for the government was consulted and advised that the government defers to the discretion of the Court. I have also spoken to Pretrial Services who defers to the Court.

WHEREFORE, Mr. Hazelwood requests that this Honorable Court enter an Order modifying the conditions of his release allowing him to substitute his third-party custodian from January 16-17 and 22-23, 2020.

DATED: Knoxville, Tennessee
January 15, 2020

Respectfully submitted,

s/ Bradley L. Henry
Bradley L. Henry (TN Bar No. 025447)
Breeding Henry Baysan PC
900 S. Gay St.
Suite 1950
Knoxville, TN 37902
(865) 670-8535
bhenry@bhblegal.com

s/ Jim Walden
Walden Macht & Haran
One Battery Park Plaza
New York, New York 10004
(212) 335-2031
jwalden@wmhlaw.com

CERTIFICATE OF SERVICE

I hereby certify that, on January 15, 2020, a true and correct copy of the foregoing document was filed on CM/ECF with the U.S. District Court for the Eastern District of Tennessee. Notice of this filing was served on all CM/ECF parties.

/s/ Bradley L. Henry